

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE**

UNITED STATES OF AMERICA

v.

Case No. 3:15-CR-27  
Varlan/Poplin

LUCA SARTINI and  
LUIGI PALMA

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**JOINT MOTION TO CONTINUE TRIAL AND ASSOCIATED DEADLINES**

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Come the Defendants, Luca Sartini and Luigi Palma, through counsel, and respectfully move the Court to continue the trial date and other associated deadlines. In support of this motion, the defendant would show as follows:

1. The defendants are charged in counts one, two, three, nine, ten, twelve, thirteen, and fourteen of the Third Superseding Indictment.
2. Counsel for Mr. Sartini was was appointed on June 26, 2020. Counsel was appointed to represent Mr. Palma on November 23, 2020.
3. The pretrial motions deadline in this matter is June 1, 2021. Trial is scheduled to begin on November 30, 2021.
4. To date, undersigned counsel has been provided discovery in digital format. The discovery provided thus far consists of approximately 2 terabytes of data.
5. The discovery in this case is extensive. To date, counsel has identified approximately one million documents provided in discovery. Undersigned counsel has endeavored to make use of available technology to review the discovery in a more efficient manner. To that end, much of the discovery provided to the government had to converted using

optical character recognition so that it was searchable. Many of the documents include emails and email chains that had to be uploaded into a database so that they were searchable and organized in a logical fashion. This process has taken a great deal of time despite due diligence.

6. It appears that the Court previously declared this case complex for Speedy Trial Act purposes on May 14, 2015 pursuant to 18 U.S.C. §3161(h)(7)(B)(ii). [ECF Doc. 44, Page ID# 443-444]. The defendants submit that the ends of justice served by granting a continuance outweigh the best interest of the public and the defendant in a speedy trial as undersigned counsel has not had an opportunity to review the voluminous discovery. (18 U.S.C. §3161(h)(7)(A)). Due to the extensive discovery and the sheer magnitude of this case, the defendants submit that the failure to grant a continuance in this case would result in a miscarriage of justice. (18 U.S.C. §3161(h)(7)(B)(i)). Finally, the failure to grant this motion would deny counsel for the defendants reasonable time for effective preparation, taking into consideration the exercise of due diligence. (18 U.S.C. §3161(h)(7)(B)(iv)).

For the foregoing reasons, a continuance of the trial date and other deadlines listed above is requested.

Respectfully submitted on June 1, 2021.

s/ Robert R. Kurtz  
Robert R. Kurtz  
BPR No. 20832  
422 S. Gay St., Ste. 301  
Knoxville, TN 37902  
865-522-9942  
865-522-9945 (fax)  
[rrkurtz@gmail.com](mailto:rrkurtz@gmail.com)

s/ Wesley D. Stone  
Wesley D. Stone  
BPR No. 21043  
100 W. Summit Hill Drive  
Knoxville, TN 37902  
865-297-3818  
[wstone@stonelawfirmpllc.com](mailto:wstone@stonelawfirmpllc.com)

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s/ Robert R. Kurtz  
Robert R. Kurtz